

AO 91  
Rev. 11/82

## CRIMINAL COMPLAINT

<b>United States District Court</b>		<b>DISTRICT</b> MASSACHUSETTS	
<b>UNITED STATES OF AMERICA</b> <b>V.</b> <b>JUDY PERREIRA</b>		<b>DOCKET NO.</b>	
		<b>MAGISTRATE'S CASE NO.</b>	
<b>Complaint for violation of Title 18 United States Code § 2113 (d)</b>			
<b>NAME OF JUDGE OR MAGISTRATE</b> Lawrence P. Cohen		<b>OFFICIAL TITLE</b> U.S. Magistrate	<b>LOCATION</b> Boston, MA
<b>DATE OF OFFENSE</b> 2/25/85	<b>PLACE OF OFFENSE</b> West Roxbury, MA	<b>ADDRESS OF ACCUSED (if known)</b>	
<b>COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:</b> <p>On or about February 25, 1985, at West Roxbury, in the District of Massachusetts, JUDY PERREIRA, did, by force and violence and by intimidation, take from employees of the Boston Five Cents Savings Bank, 1895 Centre Street, West Roxbury, MA, approximately \$1,534, in money belonging to and in the care, custody, management, and possession of said Boston Five Cents Savings Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation and during such taking did assault a teller of said bank, by means of a dangerous weapon, to wit: a handgun.</p>			
<b>BASIS OF COMPLAINANTS CHARGE AGAINST THE ACCUSED:</b> <p>SEE ATTACHED AFFIDAVIT</p>			
<b>MATERIAL WITNESSES IN RELATION TO THIS CHARGE:</b>			
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.		<b>SIGNATURE OF COMPLAINANT (official title)</b> <i>[Signature]</i>	
		<b>OFFICIAL TITLE</b> Special Agent	
Sworn to before me and subscribed in my presence, <b>SIGNATURE OF MAGISTRATE(1)</b> <i>[Signature]</i>			
			<b>DATE</b> 2/1/85

1) See Federal Rules of Criminal Procedure rules 3 and 54.

AFFIDAVIT

I, Larry A. Nivison, being duly sworn, depose and state:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed for four years. I am currently assigned to the bank robbery squad.

2. I, along with other Special Agents assigned to the bank robbery squad have recently been engaged in an investigation of a series of bank robberies occurring in the greater Boston area, which bank robberies involve a black male who occasionally operates with the assistance of a white female. The black male has been described from many of these robberies to be approximately 25-30 years of age, 6'-6'4" tall with a medium build, who typically operates by use of note which is handed to a teller demanding money and indicating that he is in possession of a handgun.

3. In the past twelve months, a black male meeting this general description and on occasion accompanied by an accomplice, is believed to have been responsible for the robbery of 22 local banks.

4. On February 28, 1985, Special Agent Mary Brennan, also of the bank robbery squad, submitted an affidavit in support of a complaint and arrest warrant for the arrest of an individual believed to be the black male responsible for these 22 local bank robberies. That individual is identified as Alphonso Cowell, and is currently in custody on charges relating to a bank robbery in the Lowell area. Mr. Cowell was arrested on February 27, 1985, by officers of the Boston Police Department.

5. On January 18, 1985, the Home Savings Bank, 69 Tremont Street, Boston, MA, was the subject of a robbery which netted the robbers \$4,200. During that robbery, a black male, believed by me to be Alphonso Coewll, and a female approached separate tellers in the bank at approximately the same time and handed separate demand letters over to each teller indicating on each demand letter that a robbery was in progress and that money was to be provided immediately. After the money was provided, the two robbers left the area of the Home Savings Bank and escaped.

6. Acting on the basis of information received, I, along with other local and federal law enforcement officers, interviewed Barbara S. Lopes, 208 Warren~~/~~ Street, Roxbury, MA. Ms. Lopes is described as a white female, 36 years old, approximately 5'5" tall with a heavy build. After being advised of her Miranda rights, Ms. Lopes indicated that she, along with Alphonso Cowell, robbed the Home Savings Bank, 69 Tremont Street, Boston, MA, on January 18, 1985. Lopes indicated that she and Cowell left the vicinity of the bank separately. On the occasion of the Home Savings Bank robbery, both the male and female perpetrators provided notes which referred to their having handguns, but neither teller made any observations of handguns in the possession of the robbers. Lopes has indicated in her statement that she in fact did not possess a handgun during that robbery.


7. The description of the female robber by a teller at the Home Savings Bank is that she was 35-40 years old, 5'4" tall, with a heavy build wearing a knit hat with a floppy brim.

8. Lopes has indicated that her sister Judy Perreira is currently living with and romantically involved with Alphonso Cowell, who is also known as Blue. Lopes has also indicated that Perreira has been involved on several occasions in bank robberies, both with Cowell and separately. After receiving that information, I displayed a photograph, which shows a white female with sunglasses and a floppy brimmed hat standing at a teller station to Ms. Lopes. The photograph had been taken by a bank surveillance camera during a robbery of the Boston Five Cents Savings Bank, 1895 Centre Street, West Roxbury, MA, on February 25, 1985. Ms. Lopes identified the photograph as a photograph of her sister Judy Perreira.

9. On February 25, 1985, a white female as depicted in the photograph shown to Barbara S. Lopes entered the Boston Five Cents Savings Bank, 1895 Centre Street, West Roxbury, MA, and made an oral demand for money. The female robber had in her possession, according to the teller, who was approached by the robber, a small handgun. The description given by the teller of the robber is that she was a white female, 5'6" tall, approximately in her forties with a beige hat and beige boots. During my interview with Lopes, she indicated that her sister Perreira had told her last week that she was going to commit another bank robbery by herself to accumulate enough money to leave the Boston area with her eleven month old child. This particular statement, as related by Lopes, was made by Perreira before the February 25, 1985 robbery.

10. Based on all of the foregoing, I have probable cause to believe that:

- (a) Barbara S. Lopes, did by force and violence and by intimidation take from employees of the Home Savings Bank, 69 Tremont Street, Boston, MA, approximately \$4,200 in money belonging to and in the care, custody, management, and possession of said Home Savings Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, on January 18, 1985;
- (b) Judy Perreira, did by force and violence and by intimidation take from employees of the Boston Five Cents Savings Bank, 1895 Centre Street, West Roxbury, MA, approximately \$1,534 in money belonging to and in the care, custody, management and possession of said Boston Five Cents Savings Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation and during such taking did assault Patricia Moriello, a teller of said bank, by means of a dangerous weapon, to wit: a handgun.

  
LARRY A. NIVISON, Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me, this 1st day of March, 1985.

  
LAWRENCE P. COHEN  
U.S. Magistrate